

REMARKS

Claims 1-9 and 20-30 are presently pending in this application. Claims 1-9 have been amended to clarify certain features to expedite prosecution of this application, and without prejudice to pursuing these claims in unamended or other forms in a continuation or other application. Claims 10-19 have been cancelled without prejudice to pursuing these claims in a continuation or other application. New claims 20-30 have also been added.

In the Non-Final Office Action mailed October 19, 2007, claims 1-19 were rejected. More specifically, the status of the application in light of this Office Action is as follows:

(A) Claims 9 and 18 were objected to as allegedly being of improper dependent form;

(B) Claims 1, 2, 4-11, 13, 15-18, and 19 were rejected under 35 U.S.C. § 103(a) over U.S. Pat. Pub. No. 2005/0099660 to Yada ("Yada") in view of U.S. Pat. No. 4,367,947 to Arter ("Arter"); and

(C) Claims 3, 5, 12, and 14 were rejected under 35 U.S.C. § 103(a) over Yada and Arter, and in further view of U.S. Pat. No. 5,774,141 to Cooper ("Cooper").

As a preliminary matter, the undersigned representative and his colleague, Aaron Poledna, wish to thank the Examiner for engaging in a telephone conference on January 16, 2008 to discuss the present Office Action, the Yada and Arter references, and the pending claims. The applicants request that this paper constitute the applicants' Interview Summary. If the Examiner notices any deficiencies with this paper in this regard, he is encouraged to contact the undersigned representative to correct such deficiencies.

The following remarks summarize and expand upon the results of the January 16th telephone conference, and they also reflect the agreements reached between the undersigned representative and the Examiner during the telephone conference. For example, the following remarks reflect the Examiner's acknowledgement that the combination of Yada and Arter cannot support a Section 103 rejection of amended independent claim 1.

A. Response to the Objections of Claims 9 and 18

Claims 9 and 18 were objected to for allegedly failing to further limit the subject matter of a previous claim. Claim 18 has been cancelled and, accordingly, the objection to this claim is now moot. Referring to claim 9, the Examiner reasons that this claim cannot feature a (dynamic) scanning unit that moves in parallel with a longitudinal (first) axis of the scan platform because independent claim 1 refers to scanning unit moving in a direction normal to this axis. However, claim 1, either as presented previously or as currently amended, does not feature the scanning unit moving normal to the first (longitudinal) axis. Rather, claim 1 features a cartridge bracket (e.g., an ink cartridge) that is carried along an axis of movement (or a movement path) that is normal to the first axis (or longitudinal axis). Accordingly, the objection to claim 9 should be withdrawn.

B. Response to the Section 103(a) Rejections of Claims 1, 2, 4-11, 13, 15-18, and 19 (Yada and Arter)

Claims 1, 2, 4-11, 13, 15-18, and 19 were rejected under 35 U.S.C. § 103(a) over Yada in view of Arter. Claims 10, 11, 13, and 15-18 have been canceled and, accordingly, the rejection of these claims is now moot. Regarding the remaining claims, as stated above, the Examiner acknowledged during the January 16th telephone conference that Yada and Arter cannot support a Section 103 rejection of amended claim 1. For example, the Examiner acknowledged that the combination of Yada and Arter fails to teach "a printing module configured to carry the cartridge bracket to a

cartridge replacement position outside of a scan footprint." Accordingly, in light of this agreement, the Section 103 rejection of claim 1 should be withdrawn.

Claims 2 and 4-9 depend from allowable claim 1. Accordingly, these claims are allowable over the combination of Yada and Arter for at least the reason that these references, either alone or in combination, fail to disclose or suggest the features of claim 1, and the additional features of these dependent claims. Therefore, the Section 103 rejection of claims 2 and 4-9 should be withdrawn.

C. Response to the Section 103(a) Rejections of Claims 3, 5, and 12-14 (Yada, Arter and Cooper)

Claims 3, 5, and 12-14 were rejected under 35 U.S.C. § 103(a) over Yada and Arter, in further view of Cooper. Claims 12-14 have been canceled and, accordingly, the rejection of these claims is now moot. Cooper is relied on in the Office Action for disclosing various types of paper conveying paths. Even assuming for the sake of argument that this is correct (and applicants expressly do not), Cooper fails to cure the above-noted deficiencies of Yada and Arter to support a Section 103 rejection of claim 1. Accordingly, claims 3 and 5 are allowable over the combination of Yada, Arter, and Cooper for at least the reason that these references, either alone or in combination, fail to disclose or suggest the features of claim 1, and the additional features of claims 3 and 5. Therefore, the Section 103 rejection of claims 3 and 5 should be withdrawn.

D. New Claims 20-30

New claims 20-30 have been added to the present application. The subject matter of these claims is supported by the figures and text of the original application. Accordingly, these claims do not add any new matter to the application and are fully supported under 35 U.S.C. § 112, first paragraph. New independent claims 22 and 25 include several features similar to those of claim 1. For example, claim 22 recites, *inter alia*, a carriage bracket configured to carry a printer cartridge along a first transverse axis of a printer to a position that is outside of a footprint of a scanner. Similarly,

independent claim 25 recites, *inter alia*, a cartridge replacement position being outside of a rectangular footprint of a scan platform. Accordingly, claims 22 and 25 are allowable over the applied references for at least the reasons explained above with respect to claim 1, and for the additional features of these independent claims.


Claims 20 and 21 depend from allowable claim 1, claims 23 and 24 depend from allowable claim 22, and claims 26-30 depend from allowable claim 25. Accordingly claims 20, 21, 23, 24, and 26-30 are also allowable, for at least the foregoing reasons, and for the additional features of these claims

Conclusion

In view of the foregoing, the pending claims comply with the requirements of 35 U.S.C. § 112 and are patentable over the cited references. The applicants accordingly request reconsideration of the application and a mailing of a Notice of Allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to contact John Tolomei at (206) 359-8140.

Dated: February 19, 2008

Respectfully submitted,

By 

Aaron J. Poledna
Registration No.: 54,675
PERKINS COIE LLP
P.O. Box 1247
Seattle, Washington 98111-1247
(206) 359-8140
(206) 359-9140 (Fax)
Representative for Applicants